

Exhibit B

IN THE HAMILTON COUNTY CHANCERY COURT
FOR THE ELEVENTH JUDICIAL DISTRICT AT CHATTANOOGA

TERPSEHORE MARAS,

Plaintiff,

v.

CHATTANOOGA NEWS CHRONICLE,
THEHUFFINGTONPOST, INC.,
REPRESENTATIVE STEVE COHEN, US
DOMINION, INC., DOMINION VOTING
SYSTEMS, INC., DOMINION VOTING
SYSTEMS CORPORATION, MEDIA
MATTERS FOR AMERICA, OHIO
INTELLIGENCE TIPS, ROSS ELDER,
and ALI ABDUL RAZAQ AKBAR a/k/a
ALI ALEXANDER,

Defendants.

Civil Action No. : 21C1017

JURY DEMAND

III

FILED IN DISTRICT
JUL 10 2021
CLERK OF COURT
HAMILTON COUNTY, TENN.

AMENDED VERIFIED COMPLAINT

COMES NOW Plaintiff Terpsehore Maras, by and through undersigned counsel and for cause of action show unto the Court as follows:

I. PARTIES AND JURISDICTION

1. Plaintiff Terpsehore Maras (hereinafter "Plaintiff") is a resident of the State of Ohio and she currently domiciled in Cleveland, Ohio.
2. Defendant Chattanooga News Chronicle, Inc. is a corporation formed in Tennessee with its principal place of business located at 611 E. Martin Luther King Blvd., Chattanooga, Tennessee 37403-4067.

000577769: For-profit Corporation - Domestic		Printer Friendly Version
Name: CHATTANOOGA NEWS CHRONICLE, INC.		
Status: Active	Initial Filing Date: 05/22/2008	
Formed in: TENNESSEE	Delayed Effective Date:	
Fiscal Year Close: December	AR Due Date: 04/01/2022	
Term of Duration: Perpetual	Inactive Date:	
Principal Office: MR. JOHN L. EDWARDS 611 E MARTIN LUTHER KING BLVD CHATTANOOGA, TN 37403-4067 USA		
Mailing Address: MR. JOHN L. EDWARDS 611 E MARTIN LUTHER KING BLVD CHATTANOOGA, TN 37403-4067 USA		
AR Exempt: No	Obligated Member Entity: No	
Shares of Stock: 1,000		

3. Defendant THEHUFFINGTONPOST, INC. is a Delaware corporation with a principal place of business located at 111 E. 18th St., New York, New York, 10003-2107.

4. Defendant Representative Steve Cohen is United States Congressman serving the 9th District (Memphis/Shelby County) and, upon information and belief, is a resident of Shelby County and he resides at 349 Kenilworth Pl., Memphis, TN 38112. <https://cohen.house.gov/press-release/president-obama-signs-cohen-speech-act-law> (last visited October 27, 2021).



5. Defendant US Dominion, Inc. is a resident of Colorado with a principal place of business located at 1201 18th Street, Suite 210, Denver, Colorado 80202.

6. Defendant Dominion Voting Systems, Inc. is a resident of Colorado with a principal place of business located at 1201 18th Street, Suite 210, Denver, Colorado 80202.

7. Defendant Dominion Voting Systems Corporation is a resident of Colorado with a principal place of business located at 1201 18th Street, Suite 210, Denver, Colorado 80202.

8. Defendant Media Matters for America is a resident of California with its principal place of business located at 75 Broadway Street, Suite 202, San Francisco, CA 94111.

9. Upon information and belief, Defendant Ohio Intelligence Tips is a blog and it not a known legal entity that is published by Ross Elde it resides at 2911 Beaumont Ave. NW Massillon, OH 44647.

10. Defendant Ross Elder is a resident of Ohio and he resides at 2911 Beaumont Ave. NW Massillon, OH 44647.

11. Defendant Ali Abdul Razaq Akbar a/k/a Ali Alexander is a resident of Texas and, upon information and belief, resides at 5125 Pinellas Ave., Keller, TX 76244.

12. The Defendants are subject to the general personal jurisdiction of this Court pursuant to Tenn. Code Ann. § 20-2-101 *et seq.* and Tenn. Code Ann. § 20-2-201 *et seq.*

13. Venue is proper pursuant to Tenn. Code Ann. § 20-4-101.

III. STATEMENT OF FACTS

14. On November 29, 2020, Plaintiff Terpsehore Maras swore under oath and penalty of perjury that the testimony she provided was true and correct to the best of her knowledge.

15. Plaintiff signed the Affidavit below, but her identity was redacted in the court filing.

I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge.
Executed this November 29th, 2020.

A large black rectangular redaction box covering the signature of the declarant.A small black rectangular redaction box covering the name of the declarant.

16. On December 2, 2020, Plaintiff's Affidavit was filed as Exhibit 13 in Attorney Sidney Powell's election fraud case styled, *Tyler Bowyer et al. v. Doug Ducey, in his official capacity as the Governor of the State of Arizona et al.*, United States District Court for the District of Arizona, Case No. 2:20-cv-02321-DJH (attached hereto as Exhibit 1).

17. Plaintiff Terpsehore Maras was the Declarant/Affiant who signed the Affidavit that was attached to the above-referenced lawsuit as Exhibit 13.

13 80. Another Declarant first explains the foundations of her opinion and then
14 addresses the concerns of foreign interference in our elections through hardware
15 components from companies based in foreign countries with adverse interests. (See Ex.
16 13). She explains that Dominion Voting Systems works with SCYTL, and that votes on
17 route, before reporting, go to SCYTL in foreign countries. On the way, they get mixed and
18 an algorithm is applied, which is done through a secretive process.

19
20 The core software used by ALL SCYTL related Election Machine/Software
21 manufacturers ensures "anonymity" Algorithms within the area of this
22 "shuffling" to maintain anonymity allows for setting values to achieve a
desired goal under the guise of "encryption" in the trap-door... *Id.*

23 81. The Affiant goes on to explain the foreign relationships in the hardware used
24 by Dominion Voting Systems and its subsidiary Sequoia and explains specifically the port
25 that Dominion uses, which is called Edge Gateway and that is a part of Akamai
26 Technologies based in Germany and China.

27 82. This Declarant further explains the foundations of her opinion and then
28

- 28 -

Case 2:20-cv-02321-DJH Document 1 Filed 12/02/20 Page 29 of 53

18. Plaintiff's sworn testimony explained the foundations of her expert opinions and her personal knowledge and then she addressed the concerns that she had regarding foreign interference in our elections through hardware components from companies based in foreign countries with adverse interests among other concerns. Complaint, ¶ 80, *Bowyer v. Ducey*, Case No. 2:20-cv-02321-DJH (D. Az. 2020).

19. According to the court's Order, entered December 9, 2020, the United States District Court for the District of Arizona stated: "But perhaps more concerning to the Court is that the 'expert reports' reach implausible conclusions often because they are derived from wholly unreliable sources." Order, p. 25. *Bowyer v. Ducey*, Case No. 2:20-cv-02321-DJH (D. Az. 2020) (attached hereto as Exhibit 2).

20. In the *Tyler Bowyer et al. v. Doug Ducey* case, multiple expert witnesses testified about the election fraud, but Plaintiff was never called to testify.

21. Other expert witnesses testified, but Plaintiff did not testify.

22. Other expert witnesses' reports were reviewed, but Plaintiff's Affidavit was not reviewed by the Arizona court.

23. The court failed/refused to examine Plaintiff's testimony.

24. Plaintiff's Affidavit was skipped over and was not reviewed by the court.

25. However, the court's Order concluded "that the 'expert reports' reach implausible conclusions often because they are derived from wholly reliable sources." *Id.*

26. The result is that Plaintiff's testimony was included in the court's Order with broad conclusions about the experts' opinions, but the court never examined Plaintiff's testimony.

27. The court's Order never stated that Plaintiff was wholly unreliable.

28. The court's Order never stated that Plaintiff's sources were wholly unreliable.

29. The court's Order never mentioned Terpsehore Maras' name.

30. The court's Order never discussed Plaintiff's testimony.

31. The court's Order never stated Plaintiff's testimony was false.

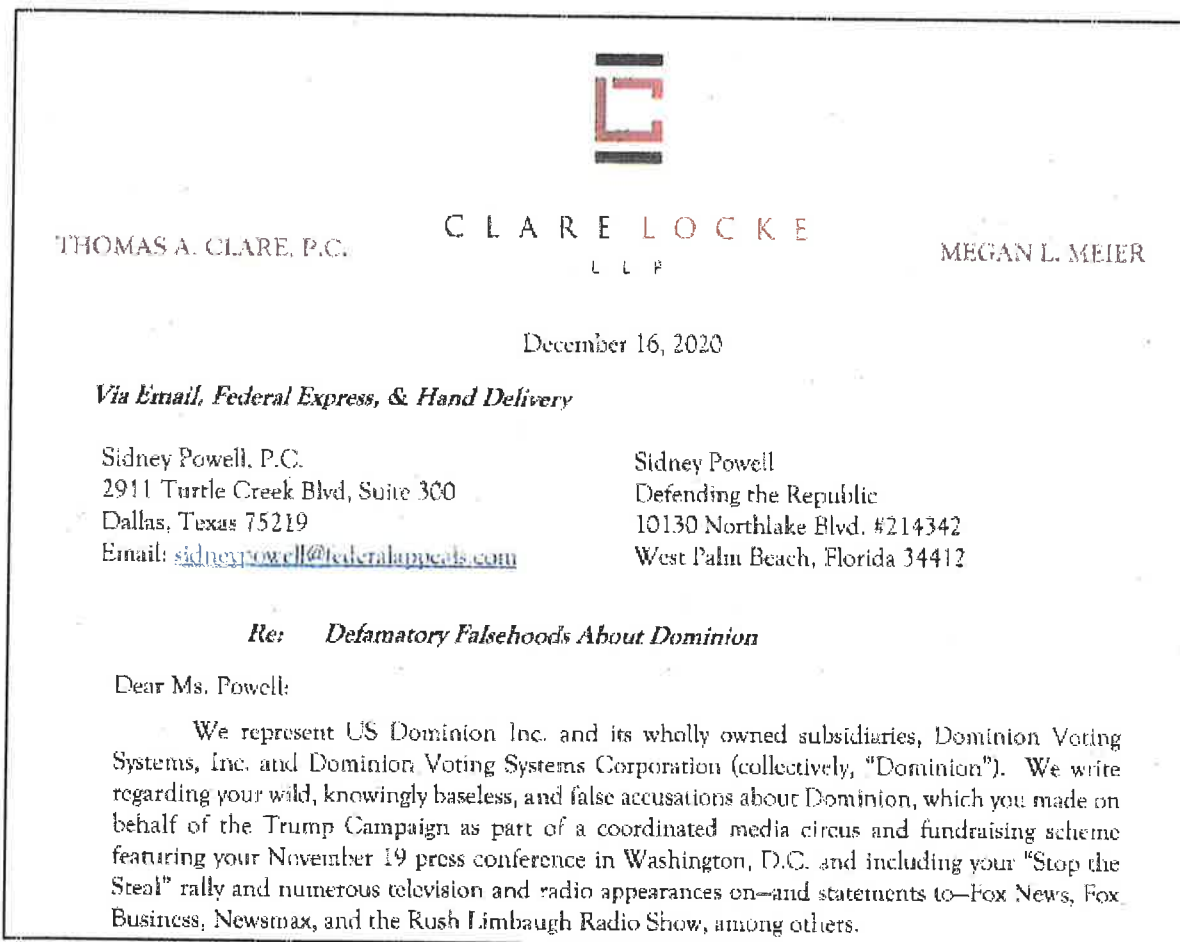
32. When the Defendants publish defamatory statements against Attorney Sidney Powell, the Kraken or any of Attorney Sidney Powell's election fraud accusations and/or conclusions, the Defendants are defaming Plaintiff.

33. Plaintiff was one of Attorney Sidney Powell's experts who testified.

34. Attorney Sidney Powell is the lawyer; she is not the expert and she does not opine.

35. The expert witnesses opine and conclude based upon a review of the evidence in the case and Attorney Sidney Powell presents these conclusions to the courts.

36. On December 16, 2020, Dominion (through its lawyers) defamed Plaintiff in a demand letter from Thomas A. Clare, P.C. and Megan L. Meier.



37. The lawyers defamed Plaintiff throughout the entire fifteen (15) pages with “wild, knowingly baseless, and false accusations” regarding Plaintiff’s expert opinion on the 2020 election fraud.

38. On December 17, 2020, Dominion published defamatory statements about Plaintiff regarding her “baseless and false accusations” and a “dangerous and reckless disinformation campaign aimed at sowing doubt and confusion over the 2020 presidential election.”

<https://www.dominionvoting.com/dominion-demands-retraction-of-sidney-powells-defamatory-falsehoods/> (last accessed August 17, 2021) (attached as Exhibit 4).

December 17, 2020

DOMINION DEMANDS RETRACTION OF SIDNEY POWELL’S DEFAMATORY FALSEHOODS

DENVER, Colorado — Yesterday, legal representatives for Dominion Voting Systems issued a letter to Sidney Powell regarding her baseless and false accusations about the company over the past two months. In spreading false conspiracy theories, undermining confidence in the election process, and putting election officials in harm’s way, Powell acted with malice in her defamatory accusations about Dominion. The letter demands a retraction of her most serious falsehoods.

"As I have testified under oath, Dominion has recently been thrust into the national spotlight as part of a dangerous and reckless disinformation campaign aimed at sowing doubt and confusion over the 2020 presidential election. The people making these baseless claims surely know they are lies, and these lies have consequences," said John Poulos, CEO of Dominion Voting Systems. "With this letter, we are asking Ms. Powell to publicly retract her false accusations and set the record straight."

39. The “baseless and false accusations about the company” is defamation against Plaintiff.

40. “Spreading false conspiracy theories” is Dominion defaming Plaintiff.

41. “Undermining confidence in the election process” is Dominion defaming Plaintiff.

42. “Putting election officials in harm’s way” is Dominion defaming Plaintiff.

43. “Powell acted with malice in her defamatory accusations [*i.e.*, the experts’ opinions and conclusions, which includes Plaintiff’s opinions and conclusions] about Dominion” is Dominion defaming Plaintiff.

44. “The letter demands a retraction of her most serious falsehoods [*i.e.*, the experts’ opinions and conclusions, which includes Plaintiff’s opinions and conclusions] is Dominion defaming Plaintiff.

45. “...a dangerous and reckless disinformation campaign aimed at sowing doubt and confusion over the 2020 presidential election...” is Dominion defaming Plaintiff.

46. “The people making these baseless claims [*i.e.*, the experts’ opinions and conclusions, which includes Plaintiff’s opinions and conclusions] surely know they are lies, and these lies have consequences, said John Poulos, CEO of Dominion Voting Systems...” is Dominion defaming Plaintiff.

47. “With this letter, we are asking Ms. Powell to publicly retract her false accusations [*i.e.*, the experts’ opinions and conclusions, which includes Plaintiff’s opinions and conclusions] and set the record straight...” is Dominion defaming Plaintiff.

48. “In its demand letter, Dominion outlines the ways in which Powell [*i.e.*, the experts’ opinions and conclusions, which includes Plaintiff’s opinions and conclusions] has actively misrepresented and manufactured evidence to support her defamatory falsehoods [*i.e.*, the experts’

opinions and conclusions, which includes Plaintiff's opinions and conclusions] against the company and its role in the 2020 election..." is Dominion defaming Plaintiff.

49. "Defamatory falsehoods [*i.e.*, the experts' opinions and conclusions, which includes Plaintiff's opinions and conclusions] are actionable in court and the U.S. Supreme Court has made clear that 'there is no constitutional value in false statements of fact.' *Gertz v. Welch, Inc.*, 418 U.S. 323, 340 (1974)..." is Dominion defaming Plaintiff.

50. "*Although the indisputable facts [which are actually in dispute] all point to the conclusion that this was a free and fair election [which ignores Attorney Sidney Powell's experts' opinions and conclusions, which includes Plaintiff's opinions and conclusions], you launched a media circus and fundraising campaign that undermined confidence in American democracy and peddled false, inherently improbable, and defamatory claims [i.e., which includes Plaintiff's expert opinions and conclusions in this statement but her testimony was never presented] about Dominion participating in an international conspiracy to rig the election, deeply damaging Dominion's hard-earned reputation and business in the process...*" is Dominion defaming Plaintiff. (emphasis in original).

51. On December 26, 2020, the HUFFPOST identified Plaintiff as the "**secret witness** who lawyer Sidney Powell has promised would reveal presidential election fraud...." https://www.huffpost.com/entry/sidney-powell-terpsichore-maras-lindeman-trump-election-fraud-special-counsel_n_5fe67309c5b6acb53457f8b4 (last accessed October 28, 2021) (emphasis added) (attached as Exhibit 5).

52. The "secret witness" referred to in THEHUFF's article is the Plaintiff.

A secret witness who lawyer [Sidney Powell](#) has promised would reveal presidential election fraud turns out to be a pro-Trump podcaster who was once sued for fraud, [The Washington Post reported](#).

Powell, a longtime [QAnon believer](#), has filed a series of failed, [typo-ridden lawsuits](#) challenging the results of the presidential election. Powell has claimed in court documents that a witness — a former “intelligence contractor” — knows about a foreign conspiracy to attack the election. Powell said her informant’s identity could not be revealed in order to protect her life.

ADVERTISEMENT

But podcaster Terpsichore Maras-Lindeman of North Dakota, who confirmed to the Post that she is the informant Powell has referred to, served less than a year in the Navy in the 1990s and there is no indication that she ever worked in intelligence or as an intelligence contractor.

Her [affidavit submitted in Powell’s lawsuit](#) is a slight rewording of one of her [blog posts written more than a year before](#) the election, according to the Post.

53. "... Trump is considering naming Powell as a special counsel to investigate election fraud. (There have been no credible reports of fraud in the 2020 election.) ..." is the HUFFPOST defaming Plaintiff. *Id* (emphasis added).

54. On January 8, 2021, Dominion filed suit against Sidney Powell, Sidney Powell, P.C. and Defending the Republic, Inc. for defamation and deceptive trade practices.

From Dominion CEO John Poulos:

"The recent attacks on the democratic process are not singular or isolated events. They are the result of a deliberate and malicious campaign of lies over many months. Sidney Powell and others created and disseminated these lies, assisted and amplified by a range of media platforms.

Lies were told about government election officials, elections workers, and Dominion Voting Systems. Those lies have consequences. They have served to diminish the credibility of U.S. elections. They have subjected officials and Dominion employees to harassment and death threats. And they have severely damaged the reputation of our company.

Today is the first step to restore our good name and faith in elections by holding those responsible to account. We intend to

55. *"The recent attacks on the democratic process ..."* is Dominion defaming Plaintiff.

56. *"a deliberate and malicious campaign of lies over many months..."* is Dominion defaming Plaintiff.

57. *"Sidney Powell and others [i.e., Plaintiff] who created and disseminated these lies, assisted and amplified by a range of media platforms..."* is Dominion defaming Plaintiff.

58. *"Lies were told about government election officials, elections workers, and Dominion Voting Systems..."* is Dominion defaming Plaintiff.

59. *"They have served to diminish the credibility of U.S. elections..."* is Dominion defaming Plaintiff.

60. *"They have subjected officials and Dominion employees to harassment and death threats..."* is Dominion defaming Plaintiff.

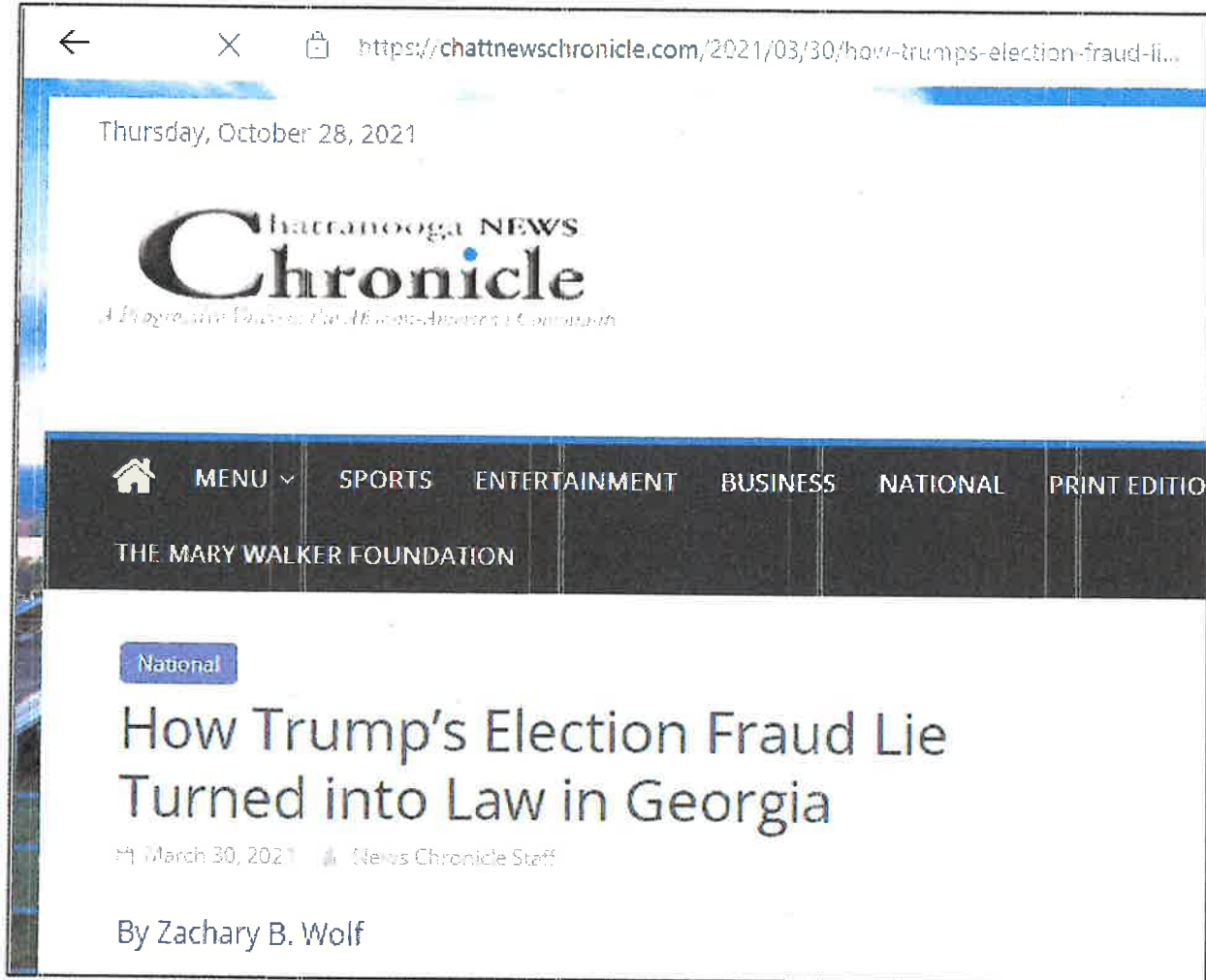
61. *"And they have severely damaged the reputation of our company..."* is Dominion defaming Plaintiff.

62. On March 23, 2021, Defendant Steve Cohen defamed Plaintiff by claiming that the election fraud movement was a con job on America and Trump supporters. <https://twitter.com/RepCohen/status/1374542548157538305> (last accessed October 28, 2021).



64. Defendant Cohen defamed Plaintiff posted on Twitter that Sidney Powell's statements about the November 2020 election fraud were "wild accusations" and "outlandish claims" that "are repeatedly labelled 'inherently improbable' and even 'impossible'..." *Id.*

65. On March 30, 2021, the Chattanooga News Chronicle published an article entitled “How Trump’s Election Fraud Lie Turned into Law in Georgia” and proceeded to defame Plaintiff. <https://chattnewschronicle.com/2021/03/30/how-trumps-election-fraud-lie-turned-into-law-in-georgia/> (last accessed October 28, 2021) (advertisements and photographs removed)



66. Chattanooga News Chronicle defamed Plaintiff by publishing false statements on its website.

67. “This is how lies turn into laws that make it harder for people to vote” is Chattanooga News Chronicle defaming Plaintiff.

68. “The same week that a major backer of former President Donald Trump’s false election fraud narrative admitted it was unreasonable, Republican lawmakers in Georgia turned legislation inspired by the false narrative into law...” is Chattanooga News Chronicle defaming Plaintiff.

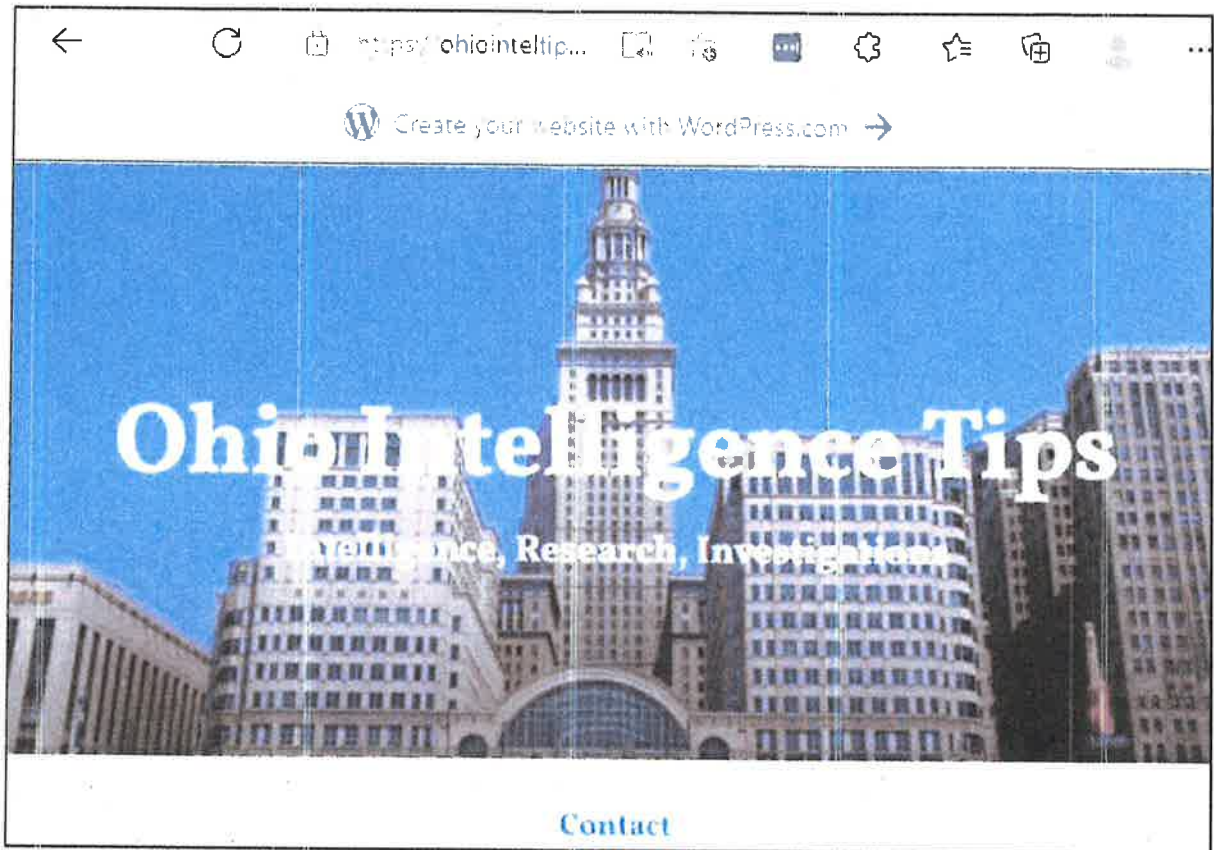
69. “Lawyer Sidney Powell, who pushed the most virulent and false claims of fraud in 2020, faces a massive defamation lawsuit by the election infrastructure company Dominion Voting Systems, which was active in Georgia in 2020...” is Chattanooga News Chronicle defaming Plaintiff.

70. “Powell repeatedly pressed the voter fraud myth as fact...” is Chattanooga News Chronicle defaming Plaintiff.

71. Defendant Media Matters defamed Plaintiff in its article entitled “Right-wing media feud erupts over Trump lawyer Sidney Powell’s bonkers election conspiracy theories”. [Right-wing media feud erupts over Trump lawyer Sidney Powell’s bonkers election conspiracy theories](#) | [Media Matters for America](#) (last accessed October 28, 2021).

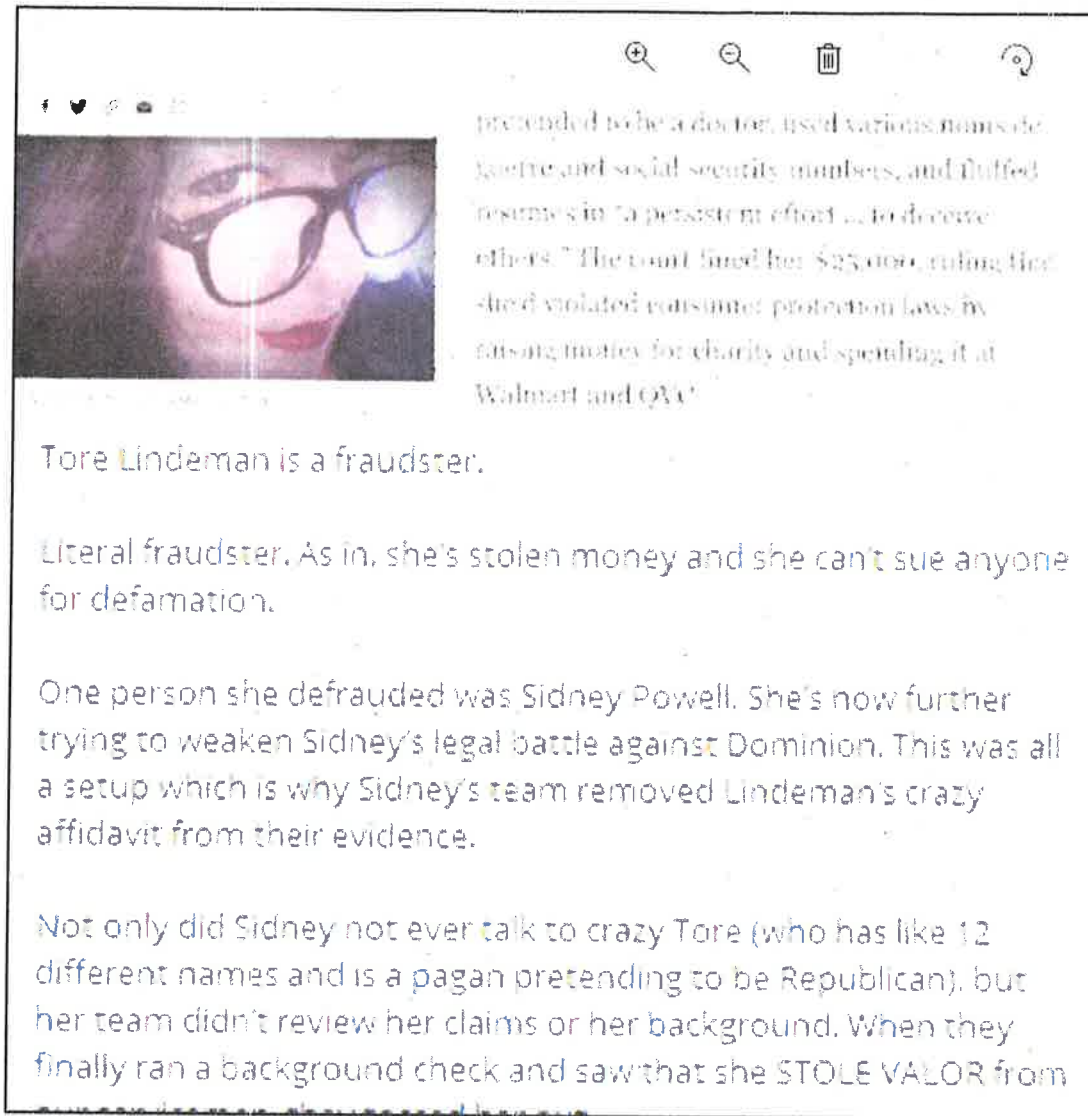


74. On October 21, 2021, Defendants, Ohio Intelligence Tips and Ross Elder, defamed Plaintiff by publishing information that claimed Plaintiff was a fraud.



75. Defendant Ali Abdul Razaq Akbar a/k/a Ali Akbar defamed Plaintiff by publishing information that claimed Plaintiff provided false information to “deceive others” and that she was a “literal fraudster” and that Plaintiff defrauded Attorney Sidney Powell.

76. Defendant Akbar falsely claimed that Plaintiff was trying to further weaken Attorney Sidney Powell’s lawsuit against Dominion and that Plaintiff was engaged in a “setup” which was why Attorney Sidney Powell allegedly removed Plaintiff’s affidavit from their evidence.



77. Defendants cannot disprove any Paragraph in Plaintiff's Affidavit.

78. The Defendants have libeled Plaintiff in Plaintiffs' Complaint, In the United States District Court for the District of Columbia, Case No. 1:21-cv-00040, filed January 8, 2021. (attached hereto as Exhibit 4).

79. Therefore, the Defendants are declaring that the Plaintiff is guilty of the crime of perjury by portraying it as false information.

80. Defendants have no applicable privilege or legal authorization to make these false and defamatory and libelous statements about the Plaintiff.

81. Defendants published the above-referenced statements with actual malice, knowing or recklessly disregarding that they are false.

82. Plaintiff is entitled to punitive damages pursuant to Tenn. Code Ann. § 29-39-104, as there is clear and convincing evidence and sworn testimony that Defendants have not proven false.

83. Plaintiff contends that the punitive damages cap is unconstitutional pursuant to The Constitution of the State of Tennessee, Art. I, Sections 6 and 17.

84. Defendants' statements are defamatory *per se*.

85. Defendants' false statements have exposed Plaintiff to the most extreme hatred and contempt and has harmed Plaintiff's professional reputation and her credibility.

86. There are no accusations that could do more damage to Plaintiff's integrity, ethics and honesty.

WHEREFORE, as a result of the foregoing, Plaintiff would respectfully request that proper process be issued and served on Defendants, requiring them to Answer under oath with a Verified Answer in the time period allotted by law, and that this Honorable Court would award Judgment in Plaintiff's favor against the Defendants as follows:

1. awarding Plaintiff compensatory damages of not less than \$1,700,000,000;
2. awarding Plaintiff punitive damages of not less than \$1,700,000,000;
3. awarding Plaintiff all expenses and costs, including attorneys' fees;
4. awarding Plaintiff pre- and post-judgment interest;

5. granting a narrowly tailored permanent injunction requiring the removal of all the Defendants' statements that are determined to be false and defamatory and enjoining the Defendants from repeating such statements in the future;
6. such other relief as the Court deems appropriate; and
7. Plaintiff's further demand a jury of twelve persons to try all issues joined herein.

Respectfully submitted this 29th day of November, 2021.

THE NEWMAN LAW FIRM

By: /s/ Russell A. Newman
Russell A. Newman, BPR # 033462
6688 Nolensville Road
Suite 108-22
Brentwood, TN 37027
(615) 554-1510 (Telephone)
(615) 283-3529 (Facsimile)
E-mail: russell@thenewmanlawfirm.com
Attorney for Plaintiff Terpsehore Maras

CERTIFICATE OF SERVICE

I, Russell A. Newman, do hereby certify that I am counsel for Plaintiff Terpsehore Maras in the above-captioned matter and that notice of this **AMENDED VERIFIED COMPLAINT** will be sent to opposing counsel with the Summons and Complaint.

Respectfully submitted this 29th day of November, 2021.

THE NEWMAN LAW FIRM

/s/ Russell A. Newman



CIVIL

SUBPOENA FOR THE PRODUCTION OF EVIDENCE

STATE OF GEORGIA
FULTON COUNTY

TO: USDC, ND of GA, ATLANTA DIVISION

You are hereby required to be at the Fulton County Superior Court before

_____, Judge of Superior Court,
in court room _____ of the Fulton County Courthouse at 1 o'clock a.m. (p.m.)

on the 19TH day of Nov, 20 21, and to bring

with you into said court certain DOCUMENTS IDENTIFIED IN
THE TN SUBPOENA to be used as evidence

by HAMILTON COUNTY CIRCUIT COURT in a certain case pending in said court

between TERPSEHORE MARAS and CHATTANOOGA NEWS CHRONICLE
ET AL.

Case number 21 C 1617

The following are hereby subpoenaed: DOCUMENTS IDENTIFIED IN THE
TN SUBPOENA.

HEREIN FAIL NOT, UNDER PENALTY OF LAW.

Witness, _____ Judge _____ of said court

this _____ day of _____ 20 _____

If you have questions contact Attorney for
Plaintiff/Defendant

Honorable Cathelene "Tina" Robinson
Clerk of Superior Court

By: [Signature]
Deputy Clerk

Phone: _____

IN THE CIRCUIT COURT FOR HAMILTON COUNTY, TENNESSEE	SUBPOENA TENN. R. CIV. PRO. 45	CASE FILE NUMBER 21C1017		
TO: (name, address & telephone number of witness) THE UNITED STATES DISTRICT COURT, FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION, RICHARD B. RUSSELL FEDERAL BUILDING 2211 UNITED STATES COURTHOUSE, 75 TED TURNER DRIVE ATLANTA, GA 30303-3309 (404) 215-1600	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 2px;"> PLAINTIFF(S) TERPSEHORE MARAS </td> <td style="width: 50%; padding: 2px;"> DEFENDANT(S) CHATTANOOGA NEWS CHRONICLE ET AL. </td> </tr> </table>		PLAINTIFF(S) TERPSEHORE MARAS	DEFENDANT(S) CHATTANOOGA NEWS CHRONICLE ET AL.
PLAINTIFF(S) TERPSEHORE MARAS	DEFENDANT(S) CHATTANOOGA NEWS CHRONICLE ET AL.			
<p style="text-align: center;"><input checked="" type="checkbox"/> SUBPOENA FOR PRODUCTION OF DOCUMENTARY EVIDENCE, TENN.R.Civ.Pro. 45.02</p> <p>You are hereby commanded to produce and permit inspection and copying of designated items (books, papers, documents, or tangible things, or inspection of premises) at the time, date, and place specified herein. Your personal appearance is not required provided you sign a notarized affidavit that the books, papers, documents, or tangible things are authentic to the best of your knowledge, information, and belief and state whether or not all books, papers, documents, or tangible things responsive to this subpoena have been produced for copying or inspection. Copies of this subpoena have been duly served pursuant to Rule 5 on all parties, and all material produced will be made available for inspection or copying by all parties.</p>				
<p><input type="checkbox"/> SUBPOENA FOR DEPOSITION, TENN.R.CIV.PRO. 45.04 <input type="checkbox"/> SUBPOENA FOR HEARING OR TRIAL, TENN.R.CIV.PRO. 45.05</p> <p>You are hereby commanded to appear at the time, date, and place specified herein for the purpose of giving testimony. In addition, if indicated, you are to bring the designated items listed. Failure to appear may be punished by fine/imprisonment as provided by law.</p>				
<p>Pursuant to TENN.R.CIV.PRO. 45.07(1), a party or attorney responsible for issuing and serving a subpoena shall provide the non-party witness at least twenty-one (21) days after service of the subpoena to respond, absent agreement of the non-party witness or a court order.</p>				
Date 19 November 2021	Time 1300	DESIGNATED ITEMS: All documents, reports, e-mails and/or other documents relating to J. Alex Halderman and The Halderman Report filed under seal.		
Place <input checked="" type="checkbox"/> Circuit Court 625 Georgia Avenue, Room 500 Chattanooga, Tennessee <input type="checkbox"/> Other:				
This subpoena is issued on behalf of: <input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT Attorney or pro se: (name, address, & telephone number)		Issued: <u>29 OCTOBER 2021</u> , LARRY L. HENRY, CLERK <small>DATE</small> CERTIFICATE OF SERVICE ATTACHED <u>YES</u> <input checked="" type="checkbox"/> <u>NO</u> BY: <u>C. Smith</u> <u>mc</u> <small>DEPUTY CLERK</small>		

Service Return	1 and 2 are for the return of an authorized officer or attorney; an attorney's return must be sworn to. 3 is for the witness who will acknowledge service and requires the witness's signature.
<input checked="" type="checkbox"/> 1. I certify that, on the date of service stated below, I served a copy of this subpoena on the witness by: <u>Hand delivery to Judge Amy Tatenberg's clerk on 29 October 2021</u>	
<input type="checkbox"/> 2. I failed to serve a copy of this subpoena on the witness because:	
<input type="checkbox"/> 3. I acknowledge being served with this subpoena on the date of service stated below.	
<input type="checkbox"/> notary: My commission expires _____ Date _____ <input checked="" type="checkbox"/> deputy clerk Sworn to and subscribed before me on <u>11-19-21</u> Date _____ <u>H. Markov</u> Signature	Date of service: <u>29 October 2021</u> <u>[Signature]</u> Signature of Witness, Officer, or Attorney

FILED IN OFFICE
 2021 NOV 19 AM 10:51
 JAY L. HENRY, CLERK
 BY [Signature]